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Date: July 11, 2008

To: Workforce Development Board Directors
WIA Youth Program Managers/Lead Contacts

From: Gary Denis, Director
Bureau of Workforce Training *Gary Denis*

Subject: **WIA Policy Update 08-04: Youth Literacy and Numeracy Gains**

Purpose

This policy update contains new information regarding the Literacy and Numeracy Gains performance measure and Automated Systems Support for Employment and Training (ASSET) reporting requirements. This policy update rescinds and replaces WIA Policy Update 07-01: Literacy and Numeracy Gains (Corrected Version) which was published on May 15, 2007.

Legislative/Regulatory References

- WIA 1998 Federal Rules and Regulations, section 664.405(a)(1)
- WIA 1998 Public Law 105-220, section 129(c)(1)(A)
- U.S. Department of Labor (U.S. DOL) Training and Employment Guidance Letter (TEGL) 17-05
- Literacy/Numeracy Questions and Answers, distributed by U.S. DOL on May 14, 2008

Background

On February 17, 2006, the U.S. DOL issued TEGL 17-05, Common Measures Policy for the Employment and Training Administration's (ETA) Performance Accountability System and Related Performance Issues. TEGL 17-05 rescinded previously issued TEGL 7-99; TEGL 6-00 change 1; and TEGL 28-04. The Youth Literacy and Numeracy Gains measure is one of three new youth performance measures created through TEGL 17-05. These measures include all youth ages 14 - 21, subject to criteria specified in each performance measure's description.

An increasing number of States have requested and received waivers from U.S. DOL to structure their programs and participant reporting around the common measures policy as opposed to continuing to report the original 17 performance measures prescribed by the WIA. The Department of Workforce Development (DWD), Division of Employment and Training (DET) plans to request a waiver to move to common measures reporting for Program Year 2008 (PY08).

If the waiver request is approved, DET will be required to negotiate new goals for the three youth common measures. DET performance policy staff have been examining participant data and test results for the past two years in preparation for this eventual transition. Through a combination of quality reviews, targeted training and ASSET enhancements, DET has sought additional guidance and clarification from the U.S. DOL regarding proper implementation of the testing requirements and results reporting to ensure that performance can be properly measured.

U.S. DOL's response to these questions has shown a shift in Federal policy on the measure and reporting requirements. This policy update communicates those changes and how they affect youth program participants and ASSET reporting. In this policy, "date of first youth service" means the actual start date of the first service paid for with WIA Title 1 Youth program funds.

Policy

All youth must be assessed for basic skills proficiency, but only those youth who are both out-of-school and basic skills deficient on the date of first youth service are counted in the Youth Literacy and Numeracy Gains measure. The measure applies to youth whose date of first service is on or after July 1, 2005. An out-of-school youth is one who, on the date of first youth service, is:

- Not attending school (high school dropout),
- Not attending school (high school graduate), or
- Attending post-secondary school.

An out-of-school youth is basic skills deficient if the youth tests at or below 8.9 in reading and/or math. The tests currently used by WDBs in Wisconsin are the Test of Adult Basic Education (TABE) and the Adult Basic Learning Examination (ABLE). U.S. DOL recommends that use of the ABLE be discontinued because it is out-of-date. DET staff encourage any WDB that still uses ABLE to switch to the TABE or one of the other approved instruments listed below.

When using the TABE, a youth is basic skills deficient if:

- Total Math score is at or below 8.9, or
- Reading score is at or below 8.9, or
- Both Total Math and Reading are at or below 8.9.

Note: *Total Math score is determined by administering the Applied Math and Math Computation tests. You may test other math skills, but if those scores are at or below 8.9, the youth is not basic skills deficient for purposes of this performance measure.*

The reading score is determined by administering the Reading test, only. You may test the youth's ability to speak and write English, but if that test score is at or below 8.9, the youth is not basic skills deficient for purposes of this measure.

Pre-tests administered up to six months prior to the date of first youth service may be used to establish the baseline for the Literacy and Numeracy Gains measure. If no pre-test was administered before the youth was referred to the WIA youth program, the youth is expected to take a pre-test within 60 days following the date of first youth service. If no pre-test is administered, the youth will fail the measure in the first year of program participation and will fail in all applicable years until a pre-test and post-test have been taken or until the youth exits the program or transfers from the youth program without exiting.

The post-test should be administered no more than one year after the date of first youth service. For example, if a youth receives their first service on June 1, 2006, the post-test must be administered on or before May 31, 2007. If the post-test is administered more than one year after the date of first youth service, the youth will fail the measure for the year of program participation for which the post-test was intended. The post-test results can be applied to the next year of program participation and performance if the youth achieves the necessary gain in educational functioning level.

Post-tests administered after the youth has exited (i.e., during follow-up) will be excluded from the measure, regardless of any gains the youth may have made. If an out-of-school, basic skills deficient youth remains in the Youth program for more than three years, the youth will be excluded from the Literacy and Numeracy Gains measure after his/her third full year of program participation.

If a youth transfers from the Youth program to another program (without exiting) during the first year of participation, they will be counted in the measure for that first year only. They will be excluded from the measure in future participation years. Follow up services can be provided in this situation, even though the youth has not exited from WIA, and the youth will still be excluded from the measure.

Approved Testing Instruments

Workforce Development Boards (WDBs) are required to use one of the following tests when assessing out-of-school youth. The same assessment tool must be administered to the participant for pre-testing and post-testing. A hyperlink to each test's location on the company's website is embedded in the text below. A web address is also included if the hyperlink cannot be accessed, but the information may be more difficult to locate since the web address takes you to the company's home page.

1. Test of Adult Basic Education (TABE) forms 9 and 10, or TABE form 7 and 8; (<http://www.mcgraw-hill.com/>)
2. Adult Basic Learning Examination (ABLE) – Second Edition; (<http://harcourtassessment.com/>)
3. Comprehensive Adult Student Assessment System (CASAS); (<https://www.casas.org/home/>)
4. WorkKeys; (<http://www.act.org/workkeys>)

The U.S. DOL has approved a new test for English as a second language educational functioning levels. If an out-of-school youth is Limited English Proficient (LEP), WDBs are required to use one of the following assessment tools. The hyperlink to each test is embedded within the text.

1. Comprehensive Adult Student Assessment System (CASAS); (<https://www.casas.org/home/>)
2. Basic English Skills Test (BEST), or
3. Basic English Skills Test (BEST) Plus; (<http://www.sabes.org/>)
4. TABE Complete Language Assessment System - English (TABE CLAS-E); (<http://www.mcgraw-hill.com/>).

Testing Youth with Disabilities

Reasonable accommodations must be provided when assessing a youth with a disability. The term disability means, with respect to an individual:

- A physical or mental impairment that substantially limits one or more of the major life activities of such individual;
- A record of such an impairment; or
- Being regarded as having such impairment.

Accommodations for assessing youth with disabilities generally fall into the following categories:

- Changes to methods of **Presentation** of the test used as the assessment tool, (e.g., providing Braille versions of the test, interpreter, large print, visual clues, repeating directions, or reading aloud).
- Changes to methods of **Response** to the test questions, (e.g., having the test taker point to a response, mark answers in book, use reference aids, calculator, tape recorder, word processor, or computer administration).
- Changes to the **Setting** in which the test is provided, (e.g., permitting test be taken at home or in small groups; separate room or special lighting).
- Changes to the **Timing/Scheduling** of the test, (e.g., permitting frequent breaks, extending the amount of time generally provided for completion of the test, or giving the test over several days).

In some instances, use of alternate assessment tools, even with appropriate accommodations, may not provide a valid or reliable evaluation of the literacy and numeracy skills of an individual with one or more disabilities. When this occurs, WDB may use an alternate assessment tool to measure literacy and numeracy gains. WDBs must contact Scott Fromader from the Department of Workforce Development (DWD) at (608) 261-4863 prior to using an alternate assessment tool.

Alternate assessments may include, but are not limited to:

- **Portfolio:** Assessment method that uses a collection of the participant's work that demonstrates the skills being assessed.
- **Performance Assessment:** Assessments that are a direct measure of skills and knowledge, usually in a one-on-one assessment.
- **Observation in Structured and Unstructured Setting:** Assessment method to observe whether participants are able to perform certain activities.
- **Samples of Participant Work:** Assessment method used to demonstrate skills being assessed.

Information specific to alternate assessments and measuring progress through use of these tools can be found on the Department of Public Instruction website:
<http://www.dpi.state.wi.us/dpi/dlse/een/eligintro.html>

For additional information about Wisconsin State Law, reasonable accommodations, alternate assessments, and transition services pertaining to youth with disabilities, you may contact one of the following individuals:

- Rick Hall, DWD/Division of Vocational Rehabilitation, (608) 261-0060;
- Sandy Berndt, Department of Public Instruction, (608) 266-1785; or
- Tom Heffron, Technical College System Board, (608) 266-3738.

Automated System Support for Employment and Training (ASSET) Reporting

Access to the Literacy-Numeracy test screens is dependent upon youth characteristics and activities reported on other ASSET screens.

Reporting Basic Skills Deficiency and Out-of-School Youth Status:

Manage Programs, Title 1 Youth tab:

- Basic Literacy Skills Deficient must be set to "Yes", and

- Meets WIA 'Out-of-School Youth' Criteria must be set to "Yes". Do not mark "Yes" for these fields if the youth does not meet either or both criteria.

Manage Services, Add Service, Youth Program Area

- A Youth service (excluding Design Framework Assessment, Case Management and Individual Service Strategy) must be reported;
- The service must have an Actual Start Date; and
- The fund source for that service must be WIA Title 1B Youth.

The Literacy-Numeracy test reporting screens can only be accessed if the participant is an out-of-school youth who has been determined to be basic skills deficient following the administration of the appropriate tests described in this policy. Accessing these test screens for any other youth participant will have a negative impact on the performance measure.

The ASSET screens are customized to ensure proper reporting, since the different test types have different reporting methods and scoring criteria. This is why the screens refresh each time data is entered in certain fields.

To report a Pre-Test:

Manage Assessment, Test Scores - Youth Literacy\Numeracy

1. Select "Add Test";
2. Select Test Category (ABE or ESL);
3. Pre-Test Overview, select appropriate Assessment Tool;
4. Select Test Form and Functional Area;
5. Enter pre-test score;
6. Enter Date Administered and Grade Equivalent;
7. Save Record; and
8. Report Functional Area 2 and 3 if necessary.

To report a Post-Test:

Manage Assessment; Test Scores Youth Literacy/Numeracy;

1. Click on Test Category listed in the test score box;
2. Select Post-Test Year One Tab;
3. Enter post-test score(s);
4. Enter Date Administered and Grade Equivalent;
5. Save Record; and
6. Report Functional Area 2 and 3 if applicable.
7. The same procedure is followed in Years Two and Three.

To end youth program activity without exiting the youth (i.e., transfer the youth to a partner program or WIA program area):

1. Manage Services:
 - a. Enter an actual close date for each Youth program funded service.
2. Manage Programs, Title 1 Youth tab:
 - a. Enter Youth End Date in the field near the top of this tab.
3. Manage Programs, Add Program/Program Area:
 - a. Open WIA Adult or Dislocated Worker, as appropriate.
4. Manage Services:
 - a. Open a service other than Self-Service or Informational.

- b. Report the fund source (Adult or Dislocated Worker, as appropriate).
- c. Enter an actual open date.
- d. Enter planned close date.

5. Manage Exits, Add Planned Episode Exit:
- a. Enter Education Status at Exit.

Note: Depending on the length of participation in a different WIA program area, the participant's education status at exit may need to be updated when the youth exits from all ASSET-tracked programs.

If Youth is being transferred to a Partner Program and you do not want the youth to exit:

1. Manage Services, Program Information, WIA Title 3:
- a. Click add service.
 - b. Select Partner Program Participation from list of Service Categories.
 - c. Open the appropriate program(s).
 - d. Enter an actual open date.
 - e. Enter a planned close date.
 - f. Report the appropriate fund source.

Action Required

This policy is effective July 1, 2008 and applies to all currently active out-of-school, basic skills deficient youth who have a date of first youth service on or after July 1, 2005. It does not apply to youth who have exited, so no data clean-up on exited participants is required.

Questions and/or Technical Assistance and Training

If you need additional information regarding this policy, please contact the Local Program Liaison assigned to your area.